

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

UNITED STATES OF AMERICA

v.

KORBEIN SCHULTZ

)
)
)
)
)
)
)

**No. 3:24-00056
JUDGE TRAUGER**

UNOPPOSED MOTION TO CONTINUE TRIAL AND RELATED DEADLINES

Through counsel, Korbein Schultz respectfully asks the Court to continue his trial that is currently set for May 21, 2024. Mr. Schultz also requests that the Court continue all filing deadlines associated with the trial, including the deadline to file pretrial motions, which currently falls on April 5, 2024. This is the first request for a continuance.

In support of this motion, Mr. Schultz would show as follows:

1. Mr. Schultz's attorney has received an initial discovery production from the government, but more discovery is anticipated. The first batch of discovery is voluminous, and counsel is still wading through it. Additionally, due to the protective order filed in this case, Mr. Schultz is not permitted to retain a copy of the discovery and review it on his own. Rather, all documents, recordings, and media files must be reviewed with him by a member of the defense team. Both Mr. Schultz and his counsel need more time to appropriately examine the discovery.
2. Mr. Schultz wishes to waive his speedy trial rights. An executed speedy trial waiver will be filed immediately following the filing of this motion.
3. Undersigned counsel is in regular communication with Assistant United States Attorney Joshua Kurtzman. The parties are working toward a resolution in this case, and Mr. Kurtzman does not oppose a continuance.

For the reasons given above, Mr. Schultz requests that the Court continue his trial and all related filing deadlines for approximately three months.

Respectfully submitted,

/s/ Mary Kathryn Harcombe
MARY KATHRYN HARCOMBE (BPR# 024466)
Assistant Federal Public Defender
810 Broadway, Suite 200
Nashville, TN 37203
615-736-5047
E-mail: MaryKathryn_Harcombe@fd.org

Attorney for Korbein Schultz

CERTIFICATE OF SERVICE

I hereby certify that on April 4, 2024, I electronically filed the foregoing *Unopposed Motion to Continue Trial and Related Deadlines* with the clerk of the court by using the CM/ECF system, which will send a Notice of Electronic Filing to the following: Joshua Kurtzman, Assistant United States Attorney, 719 Church Street, Suite 3300, Nashville, TN 37203.

/s/ Mary Kathryn Harcombe
MARY KATHRYN HARCOMBE